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June 24, 2008

Mr. Timothy J. Kobetz
Chief, Reactor Inspection Branch
Division of Inspection and Regional Support
Office of Nuclear Reactor Regulation
United States Nuclear Regulatory Commission
Washington, DC, 20555-0001

Subject: Industry Comments on Volume 1 of the Risk Assessment of Operational Events Handbook (Revision 1.01)

Project Number: 689

Dear Mr. Kobetz:

The NRC recently made Volume 1 of the NRC's Risk Assessment of Operational Events Handbook, Revision 1.01 (RASP Handbook) publicly available. Its release has facilitated a better understanding by industry of the methods and guidance being used by NRC staff when performing risk assessments of operational events and licensee performance issues.

A better understanding of the methods and guidance used by NRC is important to industry, as experience has shown numerous instances where results obtained by NRC staff have differed significantly from results obtained by industry for the same performance issue. Our review of the RASP Handbook has identified several areas where methods and guidance appear to be oriented toward establishing a conservative versus a realistic result. This appears to be in conflict with the NRC's PRA Policy Statement (60 FR 42622, August 16, 1995), which states that:

> *PRA evaluations in support of regulatory decisions should be as realistic as practicable and appropriate supporting data should be publicly available for review.*

In accordance with the above, the fundamental approach of risk evaluations is to provide the most realistic risk estimate for a given model or plant condition. This approach is more specifically discussed in Inspection Manual Chapter 0308 Attachment 3, "Significance Determination Process Basis Document."

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> *All technical judgments made by the staff within any probabilistic-based SDP tool should have bases that are clearly observable as "reasonable," as well as reasoned, based on best available information, and not purposefully biased in a conservative manner simply because of uncertainties which are applicable in both conservative and non-conservative directions.*

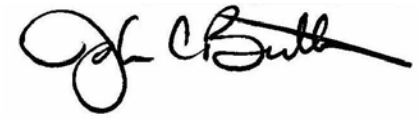
While our review found a number of areas that merit refinement, it was particularly noted that the discussions on Common Cause Failure (CCF) assumptions and Human Reliability Analysis (HRA) are, in some cases, inconsistent with common practice in PRA modeling or in direct conflict with other NRC documents, such as NUREGs.

We have prepared two short papers, one on CCF (Enclosure 1) and one on HRA (Enclosure 2), which discuss the issues identified during the review, and suggest alternative approaches that could be included in the RASP Handbook to better align the methodology with common practice.

We understand NRC is in process of developing revisions to the RASP Handbook, and hope that the enclosed comments will assist NRC efforts to improve the handbook. We are currently working with your staff to arrange a public meeting during which the enclosed comments can be discussed.

Please contact me or Victoria Anderson of the NEI staff (vka@nei.org, 202.739.8101) if you have any questions regarding these comments.

Sincerely,



John C. Butler

Enclosures

c: Mr. Paul Bonnett, U.S. Nuclear Regulatory Commission
Mr. Don Marksberry, U.S. Nuclear Regulatory Commission
Mr. Michael Franovich, U.S. Nuclear Regulatory Commission